UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Cause No. 4:08CV01688 CDP
	)	
ONE 1989 HARLEY-DAVIDSON	)	
FXRS SPORTS MOTORCYCLE	)	
FRAME SERIAL NUMBER	)	
1HD1EGL1XKY110155,	)	
	)	
ONE 1999 SPECIAL	)	
CONSTRUCTION MOTORCYCLE	)	
FRAME SERIAL NUMBER	)	
19ZWS31AAXB002748,	)	
	)	
ONE 2005 CUSTOM V-TWIN	)	
MOTORCYCLE, FRAME SERIAL	)	
NUMBER DRMVB0000156186MO,	)	
	)	
ONE 2007 CUSTOM MADE	)	
V-TWIN MOTORCYCLE,	)	
	)	
ONE HARLEY-DAVIDSON	)	
V-TWIN MOTORCYCLE,	)	
UNKNOWN YEAR, ENGINE	)	
SERIAL NUMBER 50FL1354	)	
(ALTERED),	)	
	)	
WITH ALL APPURTENANCES AND	)	
ATTACHMENTS THEREON	)	
	)	
Defendants.	)	

ANSWER TO VERIFIED COMPLAINT OF FORFEITURE

COMES NOW, the Claimant, Gerald Dragich, by and through his attorney, and submits the

following Answer to the Verified Complaint of Forfeiture:

1. Claimant admits the allegations in paragraph 1.

2. Claimant admits the allegations in paragraph 2.

3. Claimant denies the allegations in paragraph 3.

4. Claimant admits the allegations in paragraph 4.

5. Claimant admits the allegations in paragraph 5.

6. Claimant does not possess sufficient information to admit or deny, and therefore, Claimant denies the allegations in paragraph 6.

7. Claimant admits that certain property was seized from him by the Drug Enforcement Agency ("DEA") on June 24, 2008. Claimant denies the remainder of the allegations in paragraph 7.

8. Claimant admits the existence of the internet website www.invadersmcnation.com, however Claimant does not possess sufficient information to admit or deny the remaining allegations, and therefore, Claimant denies all other allegations in paragraph 8.

9. Claimant denies the allegations in paragraph 9.

10. Claimant denies the allegations in paragraph 10.

11. Claimant denies the allegations in paragraph 11.

12. Claimant denies the allegations in paragraph 12.

13. Claimant does not possess sufficient information to admit or deny, and therefore, Claimant denies the allegations in paragraph 13.

14. Claimant does not possess sufficient information to admit or deny, and therefore, Claimant denies the allegations in paragraph 14.

15. Claimant admits the allegations in paragraph 15.

16. Claimant admits the allegation in paragraph 16.

17. Claimant denies the allegation in paragraph 17.

WHEREFORE, Claimant prays that the property seized should be returned to him, that such seizure was unlawful, that Claimant is entitled to its return, as well as costs and reasonable attorney

fees, and for such other and further relief that the court deems just and proper.

DECLARATION

I, Adam Fein, am an attorney at law and a member of the law firm Rosenblum, Schwartz, Rogers and Glass, P.C., attorneys for the Claimant, Gerald Dragish, in this action. I declare under penalty of perjury that the foregoing Answer to Verified Forfeiture Complaint is based upon information furnished to me and that the contents therein are true and correct to the best of my knowledge and belief. Executed this 22nd day of December, 2008.

/s/ Adam Fein
Attorney for Claimant, Gerald Dragich

CERTIFICATE OF SERVICE

By signature above, I further certify that on December 22, 2008, the foregoing was served by the Court's electronic filing system and hand-delivered to the following:

Sam C. Bertolet
Assistant United States Attorney
c/o Janet Gum, Asset Forfeiture Specialist
U.S. Attorney's Office
111 South Tenth Street, 20th Floor
St. Louis, MO 63102

/s/ Adam Fein